

Attorneys for Defendants KIM HADDAD, KKH INC., SPIKE REAL ESTATE, LLC
(erroneously sued herein as SPIKE REAL STATE)

TAMARA DOUKAS, an individual,)	No. CV-02336-SI
)	
Plaintiff,)	
)	
v.)	DECLARATION OF PETER J. VAN
)	ZANDT IN SUPPORT OF DEFENDANTS
COUNTY OF SAN MATEO, a public)	DR. KIM HADDAD, KKH, INC. AND
entity, PENINSULA HUMANE)	SPIKE REAL ESTATE'S RESPONSE TO
SOCIETY, a private non-profit)	PLAINTIFF'S OPENING BRIEF RE
organization, DEBI DENARDI, an)	JURISDICTION
individual, KIM HADDAD, an individual,)	
KKH INC., a private entity, SPIKE REAL)	Date: October 3, 2008
ESTATE, LLC, a private entity, and DOES)	Time: 9:00 am
1 through 50, inclusive,)	Judge: Hon. Susan Illston
)	
Defendants.)	
)	
)	Complaint Filed: May 6, 2008

1. I am an attorney duly licensed to practice law before all courts in the State of California, and am a partner in the law firm of Bledsoe, Cathcart, Diestel, Pederson & Treppa, LLP, attorneys of record herein for defendant KIM HADDAD (“Defendant”), in the above-referenced action.

2. I have personal knowledge of all facts stated herein, and if called as a witness could and would competently testify to them under oath.

Executed this 11th day of September, 2008 at San Francisco, California.

Peter J. Van Zandt

EXHIBIT A

2/21/07

STATE FARM CDAVIS

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03/06 '07 09:52 NO.156 02/09

- DO NOT FILE WITH THE COURT -

CIV-050

- UNLESS YOU ARE APPLYING FOR A DEFAULT JUDGMENT UNDER CODE OF CIVIL PROCEDURE § 585 -

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): MARK L. WEBB (SBN 067959) LAW OFFICES OF MARK L. WEBB 414 GOUGH ST., #2 SAN FRANCISCO, CA 94102		TELEPHONE NO.: 415-621-4500	FOR COURT USE ONLY
ATTORNEY FOR (name): PLAINTIFF			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 COUNTY CENTER MAILING ADDRESS: 400 COUNTY CENTER CITY AND ZIP CODE: REDWOOD CITY, CA 94063 BRANCH NAME: SAN MATEO			
PLAINTIFF: TAMARA DOUKAS DEFENDANT: COUNTY OF SAN MATEO, et al.			
STATEMENT OF DAMAGES (Personal Injury or Wrongful Death)			CASE NUMBER: CIV 46 1009

To (name of one defendant only): KIM HADDAD
 Plaintiff (name of one plaintiff only): TAMARA DOUKAS
 seeks damages in the above-entitled action, as follows:

1. General damages

- | | AMOUNT |
|---|------------|
| a. <input checked="" type="checkbox"/> Pain, suffering, and inconvenience | \$ 250,000 |
| b. <input checked="" type="checkbox"/> Emotional distress | \$ 250,000 |
| c. <input type="checkbox"/> Loss of consortium | \$ |
| d. <input type="checkbox"/> Loss of society and companionship (wrongful death actions only) | \$ |
| e. <input type="checkbox"/> Other (specify) | \$ |
| f. <input type="checkbox"/> Other (specify) | \$ |
| g. <input type="checkbox"/> Continued on Attachment 1.g. | \$ |

2. Special damages

- | | |
|--|----------|
| a. <input type="checkbox"/> Medical expenses (to date) | \$ |
| b. <input type="checkbox"/> Future medical expenses (present value) | \$ |
| c. <input type="checkbox"/> Loss of earnings (to date) | \$ |
| d. <input type="checkbox"/> Loss of future earning capacity (present value) | \$ |
| e. <input checked="" type="checkbox"/> Property damage | \$ 1,000 |
| f. <input type="checkbox"/> Funeral expenses (wrongful death actions only) | \$ |
| g. <input type="checkbox"/> Future contributions (present value) (wrongful death actions only) | \$ |
| h. <input type="checkbox"/> Value of personal service, advice, or training (wrongful death actions only) | \$ |
| i. <input type="checkbox"/> Other (specify) | \$ |
| j. <input type="checkbox"/> Other (specify) | \$ |
| k. <input type="checkbox"/> Continued on Attachment 2.k. | \$ |

3. ☐ Punitive damages: Plaintiff reserves the right to seek punitive damages in the amount of (specify) \$ _____
 when pursuing a judgment in the suit filed against you.
 Date: FEBRUARY 21, 2006

MARK L. WEBB (SBN 067959)
 (TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY FOR PLAINTIFF)

(Proof of service on reverse)

STATEMENT OF DAMAGES
 (Personal Injury or Wrongful Death)

Legal
Solutions
& Plus

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 Code of Civil Procedure, §§ 425.11, 425.115